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1	PAUL HASTINGS LLP		
2	M. KIRBY C. WILCOX (SB# 078576)		
	kirbywilcox@paulhastings.com ZACHARY P. HUTTON (SB# 234737)		
3	zachhutton@paulhastings.com RYAN C. HESS (SB# 263079)		
4	ryanhess@paulhastings.com		
5	55 Second Street Twenty-Fourth Floor		
6	San Francisco, CA 94105-3441 Telephone: 1(415) 856-7000		
	Facsimile: 1(415) 856-7100		;
7	PAUL HASTINGS LLP		
8	ESTHER Y. CHENG (SB# 280547) esthercheng@paulhastings.com		
9	875 15th Street, N.W.		
0	Washington, DC 20005 Telephone: 1(202) 551-1700		
.1	Facsimile: 1(202) 551-1705		
2	Attorneys for Defendant		
	Homejoy, Inc.		
3			
4	UNITED STATES DISTRICT COURT		
.5	NORTHERN DISTRICT OF CALIFORNIA		
.6			
.7	J.C. IGLESIAS, individually and on behalf of all others similarly situated,	CASE NO. 15-CV	-1286-EMC
.8	Plaintiff,		AND [TROPOSED]
9	i iaiitiii,		THDRAWAL OF PAUL AS COUNSEL FOR
20	VS.	DEFENDANT HO	
21	HOMEJOY, INC.,	CIVIL LOCAL R	ULES 7-12 & 11-5
22	Defendant.	Judge:	Hon, Edward M. Chen,
		Department:	5
23		Complaint Filed: Trial Date:	March 19, 2015 None set
25	DENIED WITHOUT PREJUDICE		
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Case No. 15-cv-1286-EMC

STIPULATION AND [PROPOSED] ORDER FOR WITHDRAWAL OF PAUL HASTINGS LLP AS COUNSEL FOR DEFENDANT HOMEJOY, INC.

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STIPULATION

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Defendant Homejoy, Inc. ("Homejoy"), and the law firm of Paul Hastings LLP ("Paul Hastings") hereby stipulate as follows:

Whereas, Paul Hastings has represented Homejoy in this action;

Whereas, Homejoy now knowingly and freely assents to Paul Hastings' withdrawal from the action, and withdrawal is permissible under Rule 3-700(C) of the California Rules of Professional Conduct;

Whereas, Paul Hastings has taken reasonable steps to avoid reasonably foreseeable prejudice to the rights of Homejoy pursuant to Rule 3-700(A)(2) of the California Rules of Professional Conduct, including giving due notice to Homejoy and allowing time for search of new counsel;

Whereas, Homejoy and Paul Hastings acknowledge that papers may continue to be served on Paul Hastings for forwarding purposes, unless and until Homejoy appears by other counsel;

Whereas, Paul Hastings will promptly and fully comply with Rule 3-700(D) of the California Rules of Professional Conduct and cooperate with successor counsel to ensure a smooth transition and to avoid any prejudice to Homejoy;

Whereas, Paul Hastings has also represented Homejoy in three pending California state court actions, *Zenelaj, et al. v. Homejoy, Inc.*, Case No. CGC-15-544599 (San Francisco Superior Court); *Ventura, et al. v. Homejoy, Inc.*, Case No. CGC-15-544750 (San Francisco Superior Court); and *Malveaux-Smith, et al. v. Homejoy, Inc.*, Case No. 37-2015-00005070-CU-OE-CTL (San Diego Superior Court); and on July 15, 2015, Paul Hastings filed an *Ex Parte* Application to Withdraw from Representation of Defendant Homejoy, Inc., or in the Alternative, to Shorten Time to Hear Motion to Withdraw ("*Ex Parte* Application") in all three cases;

Whereas, on July 16, 2015, all three *Ex Parte* Applications were heard, and the San Francisco Superior Court granted Paul Hastings' motions to withdraw in *Zenelaj* and *Ventura*, and the San Diego Superior Court scheduled the motion to withdraw hearing for August 7, 2015, in *Malveaux-Smith*;

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1 Whereas, all parties to this action are notified of this withdrawal through the electronic 2 filing of this stipulation and proposed order; 3 IT IS THEREFORE STIPULATED, pursuant to Rules 7-12 and 11-5 of the Civil Local 4 Rules of the United States District Court for the Northern District of California, that Paul 5 Hastings may and hereby does withdraw as counsel for Homejoy in this action. 6 DATED: July <u>∂</u> /, 2015 Respectfully submitted, 7 PAUL HASTINGS LLP 8 9 By: 10 11 Attorneys for Defendant Homejoy, Inc. 12 Respectfully submitted, 13 HOMEJOY, INC. 14 DENIED WITHOUT 15 By: 16 ADORA CHEUNG 17 CEO, Homejoy, Inc. Judge Edward M. Chen 18 19 [PROPOSED] ORDER 20 21 PURSUANT TO STIPULATION, IT IS SO ORDERED Paul Hastings's request to withdraw is denied without prejudice. 22 In any future filing, Paul Hastings shall demonstrate that it has 23 7/21/15 obtained its client's informed consent to 24 DATED: ____ withdraw, and specifically informed its client of the possibility of default if 25 replacement counsel is not timely 26 obtained, and other possible negative EDWARD M. CHEN Home joy Judge of the United States District Court consequences of withdrawal. 27 shall certify that it has been so 28 notified in detail, understands the risks, and agrees to the STIPULATION AND IPROPOSED ORDER FOR withdrawal.

STIPULATION AND [PROPOSED] ORDER FOR WITHDRAWAL OF PAUL HASTINGS LLP AS COUNSEL FOR DEFENDANT HOMEJOY, INC.